

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>EBONNIE LEAVERN SIMMONS-HALL</b>	:	
<b>Debtor</b>	:	<b>CASE NO. 1:18-bk-03287</b>
	:	
<b>BankUnited N.A</b>	:	
<b>Movant</b>	:	
	:	
<b>EBONNIE LEAVERN SIMMONS-HALL</b>	:	
<b>Respondent</b>	:	
	:	

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. This paragraph paraphrases of a portion of a document, which is attached to as an exhibit to the Motion and which speaks for itself; to the extent that this paraphrase conflicts with the actual wording or meaning of the document, it is denied.
5. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
6. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
7. Denied. Debtor believes that Movant has not credited all post-petition payments and that she is due for this month. Further, Movant is protected by an equity cushion.
8. Denied. See response to paragraph 7.
9. Denied. See response to paragraph 7.
10. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

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